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March 1, 2023

VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

Re: Syracuse Mountains Corp. v. Petróleos de Venezuela S.A., S.D.N.Y. No. 1:21-cv-02684-VEC

Dear Judge Caproni:

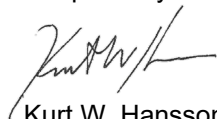
Paul Hastings LLP (“Paul Hastings”) has been retained to represent the defendant Petróleos de Venezuela S.A. (“PDVSA”) in the above-referenced case. As Paul Hastings was retained recently, it does not yet possess the client files for this matter and therefore has not been in a position to familiarize itself fully with the facts and legal issues in this case. Accordingly, PDVSA respectfully requests a modest 30-day extension to the current stay—until April 6, 2023—so Paul Hastings can coordinate with current counsel on the transfer of client files and allow sufficient time for adequate review and consideration of all of the pertinent case materials.

The current schedule established by the Court in its January 5, 2023 endorsed order (ECF No. 103) provides for the close of fact discovery on May 1, 2023, a conference before the Court on May 12, 2023 at 10:00 A.M., and the submission of a joint letter on May 4, 2023. We request a similar 30-day extension to these deadlines.

PDVSA has met and conferred with counsel for Plaintiff regarding this request for a 30-day stay, and Plaintiff consents to the request.

We are available at the Court’s convenience to answer any questions.

Respectfully submitted,



Kurt W. Hansson
of PAUL HASTINGS LLP

cc: Counsel for Plaintiff (via ECF)